

Mark Bradford  
MARK BRADFORD, P.C.  
299 12th Street  
Brooklyn, New York 11215  
(347) 413-3287  
mb@markbradfordpc.com

*Attorney for Defendant Blockchange Inc.*

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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BLOCKCHANGE VENTURES I GP, LLC,

*Plaintiff,*

v.

BLOCKCHANGE, INC.,

*Defendant.*  
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: Case No. 21-cv-891 (PAE)

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: Related Case No. 20-cv-6866 (AKH)

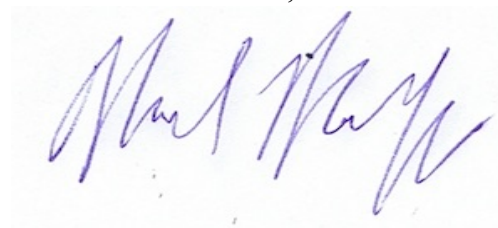
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: **NOTICE OF MOTION**  
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PLEASE TAKE NOTICE that, upon the accompanying Declaration of Mark Bradford, Esq., executed February 25, 2021, and the exhibits annexed thereto; the accompanying memorandum of law; and upon all prior pleadings and proceedings heretofore had herein, defendant BLOCKCHANGE INC. (“**Defendant**”), by and through its undersigned counsel, will respectfully move before the United States District Court for the Southern District of New York, in the courthouse located at 40 Foley Square, New York, New York 10007, at 9:30 a.m. on March 25, 2021, or as soon thereafter as counsel can be heard, for an Order dismissing the complaint in this matter in its entirety, with prejudice, upon the following grounds: (i) lack of personal jurisdiction under Fed. R. Civ. P. 12(b)(2), (ii) improper venue under Fed. R. Civ. P. 12(b)(3), and/or (iii) failure to state a claim upon which relief can be granted under Fed. R. Civ. P. 12(b)(6),

or for an Order staying this action pending resolution of a cancellation proceeding between the parties now before the Trademark Trial and Appeals Board, and granting such other, further, and different relief as this Court may deem just and proper.

Dated: New York, New York  
February 25, 2021

MARK BRADFORD, P.C.



Mark Bradford  
299 12<sup>th</sup> Street  
Brooklyn, New York 11215-4903  
Telephone: (347) 413-3287  
Email: [mb@markbradfordpc.com](mailto:mb@markbradfordpc.com)

*Attorney for Defendant  
Blockchange Inc.*

TO: BLAKE PERKINS, COUNSEL  
26 Broadway, 17th Floor  
New York, NY 10004  
212-797-1007 (Tel.)  
212-563-9280 (Fax)  
[perkins@blake-perkins.com](mailto:perkins@blake-perkins.com)

SEDHOM LAW GROUP, PLLC  
Rania V. Sedhom  
445 Park Avenue, 9th Floor  
New York, NY 10022  
212-549-1819 (Tel.)  
212-563-9280 (Fax)  
[rsedhom@bespokelawfirm.com](mailto:rsedhom@bespokelawfirm.com)

*Attorneys for Plaintiff  
Blockchange Ventures I GP, LLC*